

GOTTLIEB, RACKMAN & REISMAN, P.C.

COUNSELORS AT LAW

PATENTS · TRADEMARKS · COPYRIGHTS · INTELLECTUAL PROPERTY

270 MADISON AVENUE

NEW YORK, N. Y. 10016-0601

PHONE: (212) 684-3900 · FACSIMILE: (212) 684-3999

WEB: <http://www.grr.com> · E-MAIL: info@grr.com

ALLEN I. RUBENSTEIN
JEFFREY M. KADEN
MARIA A. SAVIO
MARC P. MISTHAL
BARRY R. LEWIN
MITCHELL S. FELLER

COUNSEL
DIANA MULLER*

*MEMBER OF THE BAR
OF ARGENTINA ONLY

DONNA L. MIRMAN
JONATHAN M. PUROW
JASON R. WACHTER
JONATHAN A. MALKI
MICHAEL NESHEIWAT
DAVID D. RODRIGUES

PATENT AGENT
ZOYA V. CHERNINA

OF COUNSEL
GEORGE GOTTLIEB
JAMES REISMAN
DAVID S. KASHMAN
TIBERIU WEISZ
SILVIA SALVADORI

April 14, 2016

Via ECF

Hon. Barbara Moses
United States District Court
Southern District of New York
New York, New York 10007

**Re: *Closed Joint Stock Co. "CTC Network", et al. v. ActavaTV, Inc., et al.,*
15 Civ. 8681 (GBD) (BCM)**

Dear Judge Moses:

In accordance with Local Rule 7.1 and the Court's Individual Practices Section II(A), the parties jointly submit this letter to request that:

- (i) Plaintiffs' deadline to file a motion to compel be adjourned from April 22, 2016 to May 6, 2016;
- (ii) Plaintiffs' deadline to file proposed findings of fact and conclusions of law and supporting papers with respect to the damages inquest be adjourned from May 13, 2016 to May 27, 2016; and
- (iii) Defendant's time to file its response with respect to the damages inquest be adjourned from June 6, 2016 to June 20, 2016.

The parties have also separately agreed that the deposition of Rouslan Tsoutiev, as representative of ActavaTV, Inc. pursuant to Fed. R. Civ. P.30(b)(6) will be postponed from April 18, 2016 to May 2, 2016.

Lastly, the parties are available for a brief status teleconference at Your Honor's convenience on April 27, 28, or 29.

This is the third joint request to adjourn Plaintiffs' deadline to file a motion to compel and the parties' respective inquest submissions. The Court granted both prior requests. (Dkt. Nos. 64, 67). A proposed order accompanies this letter.

As Your Honor is aware, following the settlement conference on April 13, 2016 the parties are engaged in ongoing negotiations. The parties believe that the adjournments sought

will assist in resolving this matter.

Respectfully Submitted,

DUNNINGTON, BARTHALOW & MILLER, LLP
Attorneys for Plaintiffs

By: /s/ Samuel A Blaustein
Raymond J. Dowd
Samuel A. Blaustein
250 Park Avenue, Suite 1103
New York, New York 10177
(212) 682-8811
rdowd@dunnington.com
sblaustein@dunnington.com

GOTTLIEB, RACKMAN & REISMAN, P.C.
Attorneys for Defendant

By: /s/ Jonathan A. Malki
Marc P. Misthal
Jonathan A. Malki
270 Madison Avenue
New York, New York 10016
(212) 684-3900
mmisthal@grr.com
jmalki@grr.com